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April 10, 2023

By ECF Hon. Gregory H. Woods United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: Donohue v. Richard Carranza, et al.

No. 20 Civ. 05396 (GHW) (SDA)

Dear Judge Woods:

We represent defendants Niagara Falls City School District s/h/a Niagara Falls Public School District and Mark Laurrie, in his official capacity as Superintendent (collectively, "Niagara"), in the above-referenced action.

Consistent with the requests made by the New York City Department of Education and Stamford Board of Education (Dkt. # 277, 278) and this Court's Individual Rules of Practice, we write to request an extension of 21 days after the issuance of the Second Circuit mandate in this case for filing motions for attorneys' fees. This is the second requested extension of time and plaintiff-relator's counsel has consented to the request.

We appreciate the Court's courtesies.

Respectfully submitted,

Jonathan P. Shaub

cc: Counsel of Record